Office of the Ethics Commissioner of Alberta

Annual Report for the period of April 1, 2013 to March 31, 2014

December 2014

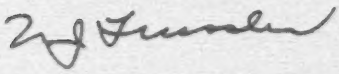
Hon. Gene Zwozdesky
Speaker of the Legislative Assembly
325 Legislature Building
Edmonton, Alberta
T5K 2B6

Dear Mr. Speaker:

It is my honour and privilege to submit to you the Annual Report of the Office of the Ethics Commissioner, covering the period from April 1, 2013 to March 31, 2014. I assumed my role as the Ethics Commissioner of Alberta on May 26, 2014.

This report is submitted pursuant to section 46(1) of the Conflicts of Interest Act, Chapter C-23 of the 2000 Revised Statutes of Alberta. The Office is responsible for the administration of both the Conflicts of Interest Act and the Lobbyists Act.

Sincerely,



Hon. Marguerite Trussler, Q.C
Ethics Commissioner of Alberta

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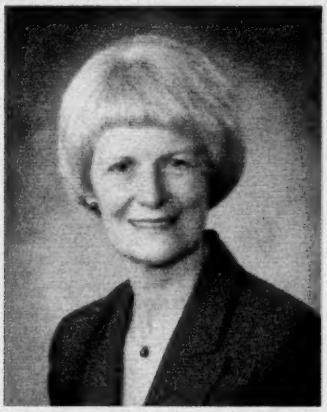


I am pleased to submit the annual report for 2013 -14 which covers a period of time prior to my assuming the role of Ethics Commissioner. My time in office has been short but I have had the opportunity to meet almost all of the Members of the Legislative Assembly. The annual disclosure meetings of all Members was completed in August. I look forward to meeting with the Deputy Ministers and Senior Officials.

Since I assumed office a number of projects have been undertaken. The Office of the Ethics Commissioner has a new website. The annual disclosure forms have been revised and are now accessible online and may be submitted electronically to our office.

A brochure has been drafted and will now be given to all candidates who file nomination papers setting out the disclosure requirements required if a candidate is elected. Work is being done to clarify the gift provisions of the Conflict of Interests Act. I have indicated to all party caucuses that I am available to make a presentation on the subject.

As well, the office instituted a review of the Act as a follow up to the report by the Select Special Conflict of Interest Act Review Committee's Report and is looking forward to the challenges presented by the amendments to the Conflicts of Interest Act, Lobbyists Act and Public Service Act.

I am pleased with the number of requests for advice that have been received and the seriousness with which all MLAs take their financial disclosure and the other obligations under the Conflicts of Interest Act.
I look forward to reviewing the Lobbyist Act to make sure that it protects both elected members and the public from undue influence.

VISION

Albertans should have confidence and trust in the integrity of their public institutions.

MISSION

Foster and encourage ethical conduct through education, public disclosures, provision of advice and investigations.

VALUES

Our values:

- Collaboration
- Confidentiality
- Dependability
- Impartiality
- Integrity
- Leadership
- Respect
- Support
- Trustworthiness

PRINCIPLES

- Fostering integrity in a respectful and supportive environment.
- Guiding public officials to reflect the values of our legislation in their every day decision-making.
- Serving the Legislature, senior officials and the public in a non-partisan manner with impartiality and independence.
- Providing confidential service that is responsive, innovative, dependable and helpful.

MANDATE

The Office of the Ethics Commissioner exists as a result of, and operates under, the *Conflicts of Interest Act*, Revised Statutes of Alberta 2000, Chapter C-23 (*"COI Act"*). The Office is also responsible for the administration of the *Lobbyists Act*, Statutes of Alberta 2007, Chapter L-20.5 (*"Lobbyists Act"*). The Ethics Commissioner is an Officer of the Legislature and is appointed by Order- in-Council following passage of a motion in the Legislative Assembly approving the appointment.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker on annual reports, investigation reports and matters relating to the Commissioner's jurisdiction or authority, excluding administrative matters. The Ethics Commissioner presents budgetary estimates through the Standing Committee on Legislative Offices. The Legislative Assembly approves the budget for the Office of the Ethics Commissioner.

CONFLICTS OF INTEREST ACT

The preamble of the *Conflicts of Interest Act* describes its basic principles as follows:

- The ethical conduct of elected officials is expected in democracies;
- Members of the Legislative Assembly serve Albertans most effectively if they come from a broad spectrum of occupations and continue to participate actively in the community;
- Members of the Legislative Assembly are expected to perform their duties of office and arrange their private affairs in a manner which promotes public confidence and trust in the integrity of each Member, maintains the Assembly's dignity and justifies the respect in which society holds the Assembly and its Members; and
- Members of the Legislative Assembly, in reconciling their duties of office and their private interests, are expected to act with integrity and impartiality.

Through the *COI Act*, the Ethics Commissioner:

- promotes understanding of the Members' obligations under the *Act*;
- receives disclosure statements from all 87 MLAs and from designated 'senior official' public servants;
- provides advice to MLAs under the *Act*, either on an individual basis or generally to all or groups of MLAs (including former Members) and to current or former political staff and senior officials as defined in the *Act*;
- provides advice under the Alberta Public Service Post-Employment Restriction Regulation to individuals governed by post-employment restrictions; and
- investigates any matter of an alleged breach of this Act by a Member, former Minister or former political staff member.

Upon receiving a report from the Ethics Commissioner, the Speaker is required to release the report publicly. If the Legislature is in session, the report is tabled in the Legislature. If the Legislature is not in

session, the report is released publicly and tabled when the Legislature next sits (per section 28 of the *COI Act*). Under the *COI Act*, if the Ethics Commissioner recommended a sanction in an investigation report, the Legislative Assembly debates and votes on the investigation report within 15 days after the report is tabled, or at such other time determined by a resolution of the Legislative Assembly.

Under section 29 of the *COI Act*, the Legislative Assembly may accept or reject the findings of the Ethics Commissioner or substitute its own findings. If the Legislative Assembly determines there is a breach, it may impose the sanction recommended by the Ethics Commissioner or any other sanction referred to in section 27(2) which it considers appropriate. The Legislative Assembly may also refrain from imposing a sanction. The Ethics Commissioner reports and recommends to the Assembly but the Legislative Assembly has full and final authority about disciplinary matters relating to its Members.

LOBBYISTS ACT

The *Lobbyists Act* is intended to enhance the integrity and accountability of government by fostering openness and transparency about who is influencing decisions made by public office holders. The *Lobbyists Act* establishes two categories of lobbyists: consultant lobbyists and organization lobbyists. The *Lobbyists Act* forbids a person from performing the activities of lobbying and providing paid advice on the same subject matter at the same time, unless an exemption is granted.

The *Lobbyists Act* preamble describes its basic principles:

- free and open access to government is an important matter of public interest;
- lobbying public office holders is a legitimate activity;
- the public and public office holders should know who is engaged in lobbying activities;
- a registration system of paid lobbyists should not impede free and open access to government; and
- the public and public office holders should know who is contracting with the Government of Alberta and provincial entities.

The Office of the Ethics Commissioner maintains a web-based Lobbyists Registry enabling real-time registration by lobbyists. It is searchable by the general public. The Registry provides openness and transparency by:

- recording the identities and activities of people paid to influence decisions made by public office holders;
- recording the identities of organizations and clients who pay lobbyists to influence the activities of public office holders on their behalf;
- allowing lobbyists to register, update, renew and terminate their own registrations on the system; and
- allowing public scrutiny. The public can view, search and obtain statistics and reports about lobbyists free of charge over the Internet.

This convenient, accessible, web-based registry allows access 24 hours per day, seven days per week, for both the public and lobbyists.

The Ethics Commissioner may authorize any individual in the Office of the Ethics Commissioner to act as Registrar and to perform any of the powers, duties or functions of the Registrar under this *Act*. The Ethics Commissioner delegated the administrative and enforcement responsibilities of the Registrar to Bradley V. Odsen, QC, per section 11(2) of the *Lobbyists Act*.

Under the *Act*, certain powers and responsibilities are reserved for the Ethics Commissioner and cannot be delegated, including:

- exemptions from the contracting prohibition, with or without conditions;
- issuing Advisory Opinions and Interpretation Bulletins; and
- banning serious offenders from lobbying.

The Ethics Commissioner reports to the Legislative Assembly through the Speaker on investigations under the *Lobbyists Act*. The Ethics Commissioner provides the report to the Speaker and if the House is sitting, the report is tabled. If the House is not sitting, the report is distributed to MLAs after which the Ethics Commissioner may make the report public. A report provided when the House is not sitting is tabled when the House next sits (per section 17 of the *Lobbyists Act*).

DISCLOSURE PROCESS

This year, all MLAs and senior officials complied with their obligation to file disclosure statements within the appropriate timelines. Compliance is dependent on the support of caucus whips along with reminders from our Office.

The Ethics Commissioner received private disclosure from all 87 Members and met with each Member personally to discuss their disclosure. MLA public disclosure statements were released through the Office of the Clerk of the Legislative Assembly.

Senior officials are also required to submit disclosure statements in addition to their obligations under the Code of Conduct and Ethics for the Public Service of Alberta. We conducted 71 disclosure meetings this year with senior officials. When reviewing disclosure by senior officials of agencies, boards and commissions, we also review compliance with their internal conflict of interest policies. The disclosure directive does not require the public release of senior official disclosure statements.

Disclosure statements include:

- the Member or senior official, their spouse or adult interdependent partner and minor children disclosing all assets, liabilities and financial interests of any private corporation in their control;
- identifying any legal proceeding brought against them; and
- ensuring no ownership of publicly-traded securities which could be materially affected by decisions made in the course of carrying out their duties, excluding investments in a blind trust.

Disclosure Statement Compliance

Category of Filer	Compliance
Members of the Legislative Assembly	100%
Senior Officials	100%

REQUESTS FOR ADVICE

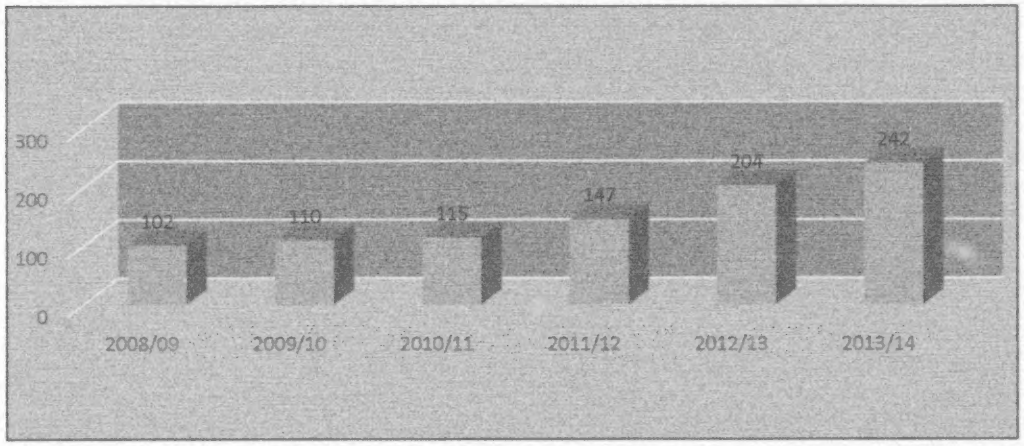
If Members, senior officials, or political staff seek and follow advice from the Ethics Commissioner the person is protected from proceedings or prosecution for a breach of the *Act*, directive or post-employment regulation resulting from the substance of that advice. Advice is given both verbally and in writing.

A confidential and searchable database of all requests and both verbal and written advice is maintained by our Office for future reference to ensure consistent responses under similar circumstances to similar requests for advice.

In the last five years:

- The number of requests for advice has increased 120%.
- The complexity of the requests and the amount of time required to research, assess and provide advice continues to increase.
- 68% of annual requests continue to fall into one of the four main categories: gifts, post-employment, investments and outside activities.

Total Requests for Advice under Conflicts of Interest Act



In 2013/14, requests for advice increased by 18%. The large number of new MLAs resulted in an increased educational component on advice matters regarding gifting, investments, outside activities and family matters.

Breakdown of Requests for Advice

Types of Advice	2011/12	2012/13	2013/14
Gifts	25	58	80
Post Employment	38	37	36
Outside Activities	23	27	26
Investments	19	17	22
Family	5	15	10
Constituency Issues	5	12	20
Codes of Conduct	14	12	3
Contracts with the Crown	4	9	10
Taking Part in Decisions	1	9	4
Conflicts of Interest	n/a	n/a	9
Reviewing SO Appointments	n/a	n/a	14
Other	13	8	8
Total	**147**	**204**	**242**

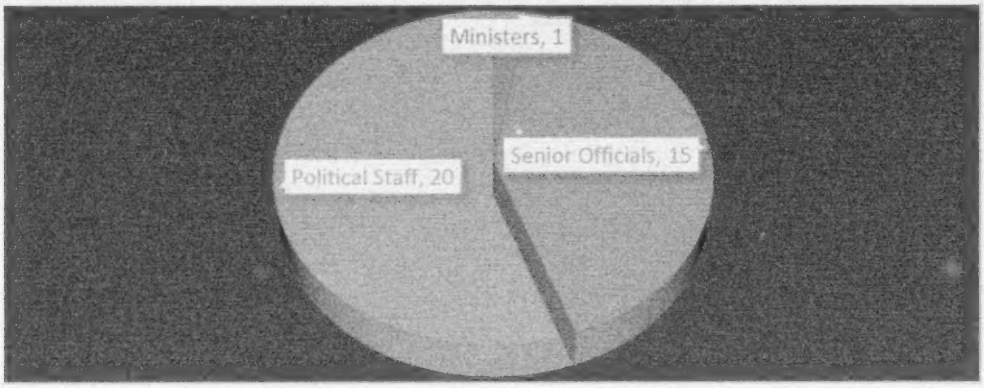
Gifts

Questions are raised about accepting tickets to sports events, fundraisers, conferences and non-commercial flights. Members are advised to track all gifts, including event tickets, to ensure they are mindful of both the value of cumulative gifts they receive from one source in a calendar year and any connection between a source and the Member's public responsibilities.

Post-Employment

Post-employment questions are raised by departing Ministers, senior officials and political staff.

Post-Employment Questions by Category, 2013/14 (Total: 36)



Outside Activities

Questions regarding outside activities almost exclusively deal with volunteer board activities in community organizations and clarification on external business activities.

Investments

Investment requests remained stable in 2012/13, attributed to the change in Ministers, Associate Ministers and senior officials. Advice was sought on matters relating to blind trusts and personal investments. Where potential conflicts existed, appropriate steps were taken by the parties to remove themselves from the situation prior to a conflict arising.

Family

Questions involving family members relate to either the employment or activities of a spouse or child. If the question involves a family member's investments, the question is included under Investments.

Constituency Issues

Questions relate to assisting constituents, using the constituency allowance or social obligations within the constituency. Where questions about the Member's constituency allowance fall more within the mandate of the Office of the Speaker, the Member is referred to Legislative Assembly staff.

Codes of Conduct

Several boards and senior officials sought informal confidential advice on conflict of interest matters relating to their agency's code of conduct. The Ethics Commissioner has no legislative authority to provide formal advice. We assist agencies and senior officials upon request but the advice provided is not binding. All informal advice includes referral to their agency's code administrator.

Contracts

Contract questions are often raised by new Members about their dealings with ATB Financial or other Crown contracts.

Taking Part in Decisions

Generally, Members consider their personal holdings and those of close family members and ask whether it is appropriate to participate in a decision before the Legislative Assembly or one of its committees, or before Executive Council or one of its committees. Our Office advises whether a private interest is involved or whether the matter is a general application which affects the Member only as a broad class of the public, thereby allowing the Member to participate and vote.

Conflicts of Interest

This is a new general category where requests for advice do not fall within the other categories but does fall within the general scope of the Conflicts of Interest Act.

Reviewing Senior Official (SO) Appointments

Sometimes, as part of the screening and hiring process, potential conflicts of interest issues arise with certain candidates for certain senior government positions. In these cases, or in cases where it is prudent to ensure there are no underlying conflict of interest issues, the Ethics Commissioner may review selected candidate's backgrounds and investment holdings to ensure there are no issues and provide related advice.

Other

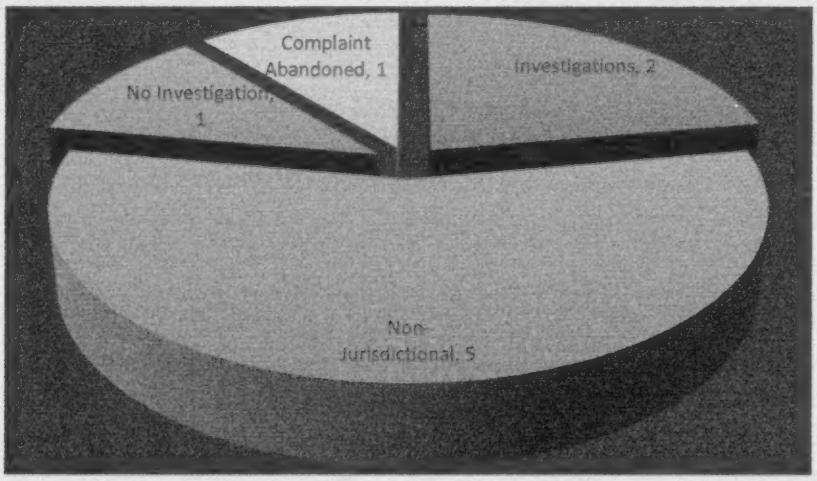
This category covers any request not captured by the above areas.

REQUESTS FOR INVESTIGATIONS

Once again, the majority of requests for investigation involve matters that are non-jurisdictional. The Redford Investigation was carried forward from last year, but is not reflected in the numbers below.

In 2013/14, nine requests for investigations were received, seven of which pertained to MLAs. Two requests resulted in investigations pertaining to Peter Sandhu (see further below for more information). Of the remaining seven, five were determined not to fall within the scope of the investigative powers of this office under the legislation. In those cases, citizens were referred to an appropriate office for assistance in non-jurisdictional requests. Of the other two requests, one was abandoned by the Complainant and in the other remaining case the Ethics Commissioner determined that a formal investigation was not warranted based on the evidence and allegation made.

Request for Investigations by Category (Total: 9)



Below is a summary of the three investigations completed in 2013/14.

The first, an Investigation of the Honourable Alison Redford, Q.C., was commenced in 2012/13, and concluded in November, 2013, with a finding that the Honourable Member had not breached the Conflicts of Interest Act, while Minister of Justice, with respect to the awarding of a contract of engagement to an international consortium of law firms to conduct tobacco litigation on behalf of the Province of Alberta.

The second, commenced and completed in 2013, of Member Sandhu found that Member Sandhu had, over a period of several years, mistakenly failed to disclose six instances of litigation in which his directly-associated business was involved, in breach of the Conflicts of Interest Act. On the basis of findings and precedent, no sanction was recommended for imposition against Member Sandhu.

The third, also commenced and completed in 2013 against Member Sandhu, found that while he had been somewhat overzealous in advocating for legislative changes, the changes he was seeking would affect a broad class of Albertans, was therefore not in advancement of a private interest as defined in the Conflicts of Interest Act, and there was no breach of the Act.

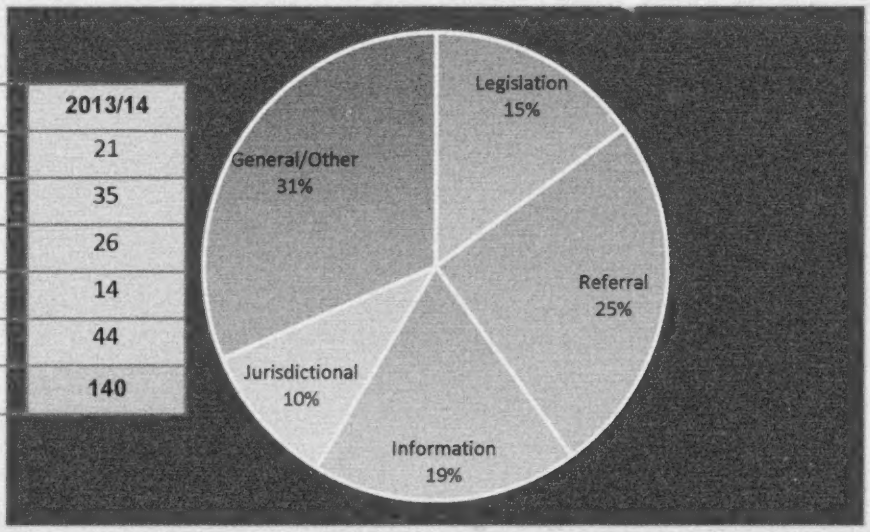
The Investigation Reports that were tabled in the Legislative Assembly on these matters can be found at: http://www.ethicscommissioner.ab.ca/publications/investigation-reports/commissioner-wilkinson/

REQUESTS FOR INFORMATION

We received 140 requests for information this year. The majority of requests were from callers seeking clarification about the Ethics Commissioner's mandate and the relevant legislation. Information requested concerned employment standards, professional standards and conduct, MLA compensation, post-employment, blind trusts, gift acceptance, public disclosure, conduct in non-profit organizations and legislation surrounding investigations. Callers who we are unable to assist are referred to the appropriate office.

Request for Information (Total: 140)

Requests for Information	2013/14
Legislation	21
Referral	35
Information	26
Jurisdictional	14
General/Other	44
Total	**140**



Total Requests Received for:	2011/12	2012/13	2013/14
Advice	147	204	242
Investigations	20	11	9
Information	95	208	140
TOTAL	**262**	**423**	**391**

COMPARATIVE SUMMARY STATISTICS

EVENTS AND CONFERENCES

Participating in annual conferences is very beneficial to our small office. This provides the Commissioner and staff the opportunity to exchange information with peers on issues of common interest and review legislative and regulatory differences and trends.

This year, the Office attended the annual Canadian Conflicts of Interest Network conference, the Council of Governmental Ethics Laws conference and the Lobbyist Registrars and Commissioners Conference.

PUBLICATIONS

Our performance measurement process includes a routine review of our brochures and guides to ensure they are current to the relevant legislation or regulation. We also review our educational information to ensure it is as user-friendly as possible.

We currently produce the following brochures under the COI Act. All publications are available on our website at www.ethicscommissioner.ab.ca

- Conflicts of Interest
- Background and Role
- Quick Guide to Determining a "Private Interest"
- Disclosure Statements
- Gift Acceptance and Disclosure
- Investigations / Inquiries
- Members of Executive Council
- Post-employment regulation
- Post-employment Obligations for Former Political Staff Members
- Candidates Seeking Federal Election
- Officers of the Legislature
- Ethics (school presentation)
- Candidates Seeking Election Provincial Election

Under the Lobbyists Act:

- Am I a Lobbyist?
- Are You a Lobbyist?
- What is Lobbying?
- Contracting Prohibitions

LOBBYIST UPDATE

The Alberta Lobbyists Registry is entirely web-based, and came on-line on September 28, 2009. In its fourth year of operation in 2013-2014, it continues to be effective in achieving the public policy expectations set out in the *Lobbyists Act*.

Outreach

As had been noted in previous Annual Reports, after reaching a pinnacle in 2009-2010, there has been a slow but steady decline in the demand for presentations and the opportunities to offer presentations. This continuing decline in educational outreach reflects the fact that the majority of those affected by the *Lobbyists Act* are aware of it and its requirements and are in compliance.

There were only 2 formal presentations made in 2013 – 2014 and interestingly, in both instances the requested presentation was for a nuanced examination of ethics and conflicts of interest issues as much as lobbyists issues. It remains the case that the most common form of educational outreach is telephone and electronic communications with individual lobbyists, both consultant and organization, who are new to the business of lobbying and reporting on lobbying activities. The Registrar also met with representatives of four different business and lobbying organizations to discuss their particular issues in detail.

Media in 2013-2014 included interviews given for articles published in the *Edmonton Journal*, *Calgary Herald*, *The Globe and Mail*, *The Armet Report*, and *The Lobby Monitor*. Recorded (audio and audio-visual) Interviews were also given to *CBC/Radio-Canada*, *CBC Radio*, *Global TV*, *City TV*, and *CTV*.

Presentation Comparison Chart

Number of Presentations	**2011/12**	**2012/13**	**2013/14**
Associations	1	2	2
Businesses	0	0	4
MLAs & Staff	0	0	0
Government	2	1	0
Junior High School Classes	3	0	0
University of Alberta MBA Class	1	0	0
TOTAL	**7**	**3**	**6**

A total of 100 attendees participated in presentations in 2013-2014. More than 1,250 people have attended presentations in the five years from April 1, 2009 through March 31, 2014.

Requests for Information

We continue to receive requests for information from consultant and organization lobbyists and other interested parties about the obligations and requirements under the *Act*. As expected, requests declined after the first full year following the proclamation of the *Act* in September 2009, and have more or less averaged out since that time. Other communications concerned:

- effecting notices of change;
- semi-annual renewals;
- terminating registrations of lobbying activities which were concluded;
- advice and assistance on completing the registration form online; and
- support for minor technical difficulties, which were usually resolved in less than one working day.

Communications about the *Act* and Registry were conducted electronically via email and by telephone. Communications were consistently effected in a timely manner. In every instance, the performance target was exceeded, although it should be noted that declines in response times in 2013/2014 compared to previous years are a direct reflection of the level of activity in relation to investigations under the *Conflicts of Interest Act* conducted by the Registrar in his capacity as General Counsel to the Office of the Ethics Commissioner.

Performance Measures

Activity Measure	2011/12 Actual Percentage (Target)	2012/13 Actual Percentage (Target)	2013/14 Actual Percentage (Target)*
Respond to voicemails within four hours	98 (90)	98 (90)	94 (90)
Respond to emails within one business day	96 (90)	97 (90)	95 (90)
Respond to service request within two hours	99 (95)	99 (95)	97 (95)
Resolve service issue within two days	92 (75)	89 (75)	91 (75)

Statistical Year in Review

Telephone Inquiries	2011/12	2012/13	2013/14
Total calls	534	407	433
Average per week	10.3	7.8	8.3

Email Inquiries	2011/12	2012/13	2013/14
Total emails	1,690	1,916	2,234
Average per month	141	160	186

As previously mentioned, 2013-2014 is the fourth full year of Registry operations. Most of the people and organizations subject to the *Act* are now familiar with its application to their circumstances and are also familiar with the online registry. It **should be noted the email count includes only messages received; it does not reflect responses to message received or emails originating with the Registrar.**

LOBBYISTS REGISTRATIONS

The response from the lobbying community to the Act and the Registry continues to be overwhelmingly positive.

Registration Activities April 1, 2013 - March 31, 2014

Consultant Lobbyists	Updates	Undertakings
Registered undertakings carried forward from previous year		178
Current Year Activities:		
- New undertakings	52	52
- Change notices	47	
- Terminations	47	(47)
Undertakings as at March 31, 2014		183

Organization Lobbyists	Updates	Registrations
Registered organizations carried forward from previous year		175
Current Year Activities:		
- New organizations	38	38
- Change notices	65	
- Semi-annual renewals	426	
- Terminations	4	(4)
Registrations as at March 31, 2014		209

679 registrations required review, approval and posting for an average of about thirteen per week.

REGISTRY WEBSITE ACTIVITY

One measure of whether the *Act* and the Registry are fulfilling its public policy purpose can be found, in part, by tracking the registry website activity.

Registry Website Activity April 1, 2013 – March 31, 2014

	2012/13 Total (Avg/mo)	2013/14 Total (Avg/mo)
Unique Visitors	15,539 (1,295)	17,495 (1,458)
Number of Visits	30,108 (2,509)	37,703 (3,142)
Pages Viewed	377,394 (31,450)	278,145 (23,179)
Hits	832,654 (69,388)	696,364 (58,030)

INVESTIGATIONS

Section 15 of the *Lobbyists Act* sets out when the Registrar shall conduct an investigation and when the Registrar can exercise discretion to decline an investigation. It states:

Investigations

15(1) The Registrar shall conduct an investigation if the Registrar has reason to believe that an investigation is necessary to ensure compliance with this Act.

(2) The Registrar may refuse to conduct or may cease an investigation with respect to any matter if the Registrar is of the opinion that

(a) the matter is one that could more appropriately be dealt with according to a procedure provided for under another enactment,

(b) the matter is minor or trivial,

(c) dealing with the matter would serve no useful purpose because of the length of time that has elapsed since the matter arose, or

(d) there is any other valid reason for not dealing with the matter.

When an allegation and a request for an investigation is received, it must first be determined if the allegation falls within the jurisdiction of the *Lobbyists Act*. If it does, it is then determined if there is evidence to support the allegation included with the request for investigation. If there is some evidence that appears to support the allegation, then an investigation is commenced. If there is no such evidence, the Registrar initiates an administrative inquiry to determine whether there may be sufficient grounds to commence an investigation.

There were no requests for an investigation under the *Lobbyists Act* received in 2013-2014.

Since the *Lobbyists Act* was proclaimed, 2013-2014 is the first year that there has not been at least one investigation or request for investigation.

LEGISLATIVE REVIEW

As noted in the two previous Annual Reports, the *Lobbyists Act* was reviewed by the Standing Legislative Offices Committee in 2011, culminating in a Report issued in November, 2011. The next review is required to be begun no later than 2016.

REGISTRAR'S REMARKS

The *Lobbyists Act* and Registry have made a significant contribution to the openness, transparency and accountability of government in Alberta. The effectiveness of this *Act* is demonstrated by the fact that when doing a complete overhaul of its lobbyist legislation in 2009, the government of British Columbia looked to the Alberta *Act* as providing the model for its amended legislation. And since that time, the governments of Manitoba and Saskatchewan have also looked to the Alberta *Act* to provide guidance in the introduction of their lobbying legislation, and the Ontario Integrity Commissioner has also referenced it in her request for amendments to the Ontario legislation.

The past year has seen the Registrar continue to review submissions for posting to the Registry, respond to telephone and electronic queries and address technical issues in a timely and effective manner.

These accomplishments could not have been achieved without the diligent support and efforts of:

- Neil Wilkinson, Ethics Commissioner – constant support, encouragement, and critical advice;
- Glen Resler and then Kent Ziegler, Chief Administrative Officer, Office of the Ethics Commissioner – business support and encouragement;
- Louise Read, Executive Support, Office of the Ethics Commissioner – administrative support;
- Rob Wright, AAD Inc. – website design, hosting and web master;
- Longview Systems – IT support; and
- The many lobbyists for their cooperation, patience and understanding.

The value of the team approach taken by this office cannot be over-emphasized; it is this teamwork that enables the smooth functioning of the Registry.

Finally, we gratefully acknowledge the valuable advice and counsel provided without hesitation by the other Lobbyist Registrars and Commissioners in Canada and their General Counsel.

Bradley V. Odsen, QC
Registrar